

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

THE COLEMAN COMPANY, INC.,	§	
	§	
<i>Plaintiff/Counterclaim Defendant,</i>	§	Civil Action No. 2:20-cv-351-RGD
	§	
v.	§	
	§	
TEAM WORLDWIDE CORPORATION,	§	
	§	
<i>Defendant/Counterclaim Plaintiff.</i>	§	

**JOINT MOTION TO EXTEND FACT DISCOVERY DEADLINE FOR THE PURPOSE
OF COMPLETING FACT WITNESS DEPOSITIONS**

Defendant/Counterclaim Plaintiff Team Worldwide Corporation (“TWW”), Counterclaim Plaintiff Cheng-Chung Wang (“Wang”), and Plaintiff/Counterclaim Defendant The Coleman Company, Inc. (“Coleman”), by and through undersigned counsel, hereby file this joint motion pursuant to Fed. R. Civ. P. 6(b)(1)(a) for an extension of time of the deadline for the parties to complete fact discovery solely with respect to the completion of fact witness depositions, and in support state as follows:

1. Pursuant to the Rule 16(b) Scheduling Order entered by this Court on December 18, 2020, the parties are to complete fact discovery, excluding expert discovery, on or before May 28, 2021. (ECF No. 26). The parties are to complete expert discovery by August 23, 2021 and conduct a final pretrial conference on September 16, 2021. (*Id.*)

2. The parties have been conducting discovery, including producing documents and meeting and conferring to resolve discovery disputes without intervention by this Court.

3. However, due to certain witnesses being located outside of the United States and to permit the parties to complete document productions, email discovery, and resolve discovery

disputes prior to taking fact witness depositions, the parties request an extension of the fact discovery deadline to June 28, 2021 solely for the purpose of completing depositions of fact witnesses.

4. The parties do not seek an extension of the fact discovery deadline for any purpose other than to complete fact witness depositions.

5. The parties do not request this extension for the purpose of delay. All other fact discovery will proceed as scheduled and be completed by the current deadline of May 28, 2021 with the sole exception of fact witness depositions. This extension will not affect or delay the current expert discovery deadline, final pretrial conference, or trial date. Additionally, no party will be prejudiced by the requested relief sought, as evidenced by all parties' consent to this request.

WHEREFORE, the parties respectfully request that this Motion be granted and that the Court enter the attached Proposed Order.

May 10, 2021

The Coleman Company, Inc.

Team Worldwide Corporation and Cheng-Chung Wang

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